

May 11, 2005

MEMORANDUM

FROM: Anna Treinies
Toxicologist, Superfund Technical Support Team

TO: Gary Miller
Project Manager, Superfund ARK/TX Program Management Section

RE: Comments on the Interim Removal Action Scope of Work, Gulfco Marine
Maintenance Site, Freeport, Texas

Conceptual Site Model - Figure 1

A pathway for indoor air vapor intrusion to the neighboring residential area should be included as a possible route of exposure from groundwater and DNAPL migration.

Proposed Groundwater Sampling Locations - Figure 4

Additional groundwater sampling locations should be included along the southwestern edge of the facility to address possible migration of contaminated groundwater offsite (possibly impacting the residential area). If contaminated groundwater is detected in the residential area off site, the vapor intrusion pathway will need to be evaluated.

Scope of Work

Detection limits must be evaluated prior to sampling to ensure that detection limits are below appropriate human health and ecological screening values. Quality control criteria should be evaluated to ensure appropriate method detection limits are met. In accordance with the Texas Risk Reduction Program all sample quantitation limits should be less than the residential assessment level for environmental medium. It is not clear why only selected trace metals are being evaluated rather than a full evaluation of metals.

Sediment Investigation

The Point of Exposure (POE) for humans receptors is considered to be within the upper foot and for ecological receptors the POE is considered to be the active aerobic sediment layer (frequently considered to be the upper four inches). I would expect to ecological assessment to evaluate more than the upper four inches of sediment.

Because the site is currently listed under the Region 6 Superfund Program, it is recommended that the Region 6 Media Specific Screening Levels be used in the risk screening process. Typically EPA screens constituents at the 1×10^{-6} level rather than the 1×10^{-5} or 1×10^{-4} (Cumulative Screening) that the TRRP allows. Similarly EPA screens for non cancer risk is with a HQ of 1 for both single chemical and multiple chemical while the TRRP allows for a HQ of 10 for multiple chemical exposures. The site will need to be delisted by EPA and the Superfund Program does not use the state TRRP guidance in its review of sites.